

REMARKS

In the Office Action mailed April 7, 2006, the Examiner rejected claims 8-10 under 35 U.S.C. § 102(e) as anticipated by *Haseltine* (U.S. 6,578,015 B1); rejected claims 1-7 and 14-20 under 35 U.S.C. § 103(a) as being unpatentable over *Haseltine* in view of *Newswire* (PR Newswire, "Sun-Netscape Alliance's New Internet Billing Consolidation Application to Help Make Internet Billing a Reality for Consumers." New York: December 6, 1999, 4 pages); and rejected claims 11-13 and 21-29 under 35 U.S.C. §103(a) as being unpatentable over *Haseltine*.

Based on the following remarks, Applicants respectfully traverse the rejections of under 35 U.S.C. §§ 102(e) and 103(a).

I. The Rejections under 35 U.S.C. § 102(e)

The Examiner asserts that *Haseltine* teaches every recitation of claim 8. In particular, the Examiner alleges that the thin consolidator disclosed in *Haseltine* teaches "biller-dependent modules for retrieving information from data stored by the biller." Applicants respectfully disagree.

The "thin consolidator maintains a database similar to that shown at reference at 400 in FIG 4." (*Haseltine* at column 10, lines 46-47.) However, because the thin consolidator "typically carr(ies) only bill summaries," it "refer(s) the customer to the biller's own Web site for further detailed bills and/or further customer service, such as to discuss a disputed bill." (*Haseltine* at column 2, lines 39-42.) In "the case wherein the thin consolidator also maintains bill detail tables within its database, detailed bill data may also be available." (*Haseltine* at column 10, line 66 to column 11, line 1.) Thus, when the bill data requested by the customers is available within its database, the thin consolidator may retrieve the data from its own database and presents it to the

customers so that the customers can “view and/or pay” their “bills for one or more billers having contracted with the thin consolidator.” (*Haseltine* at column 10, lines 61-62.) When, however, the bill data requested by the customers is not available, the thin consolidator “refer(s) the customer to the biller’s own Web site for further detailed bills.” (*Haseltine* at column 2, lines 39-41.) To successfully refer the customer to the biller’s own Web site, “the thin consolidator may also maintain a customer-accessible link to” the biller’s Web site. (*Haseltine* at column 11, lines 2-3.) The customers then *directly* connect to the biller’s Web site and obtain “detailed bill information *independently* of the thin consolidator.” (*Haseltine* at column 11, lines 11-15.) Nowhere does *Haseltine* disclose a thin consolidator that accesses information from data stored by the biller. Indeed, the Examiner refers to components of thick and thin consolidator modules in reference to biller modules. (OA. at p.2.) Therefore, *Haseltine* does not teach “biller dependent modules for retrieving information from data stored by the biller,” as asserted by the Examiner.

Accordingly, *Haseltine* does not support the rejection of claim 8 under 35 U.S.C. § 102 (e), as asserted by the Examiner. Therefore, Applicants respectfully request that the Examiner withdraw the rejection and allow the claim.

Claim 9 depends from claim 8. As explained, *Haseltine* does not support the rejection of claim 8. Accordingly *Haseltine* also does not support the rejection of claim 9 for at least the same reasons set forth above in connection with claim 8. Further, *Haseltine* does not disclose the recitations of claim 9. For example, *Haseltine* does not teach “a client object, connected to the bill presentment and payment module.” Instead, *Haseltine* discloses an embodiment of the invention “implemented as a database.”

(*Haseltine* at column 4, lines 41-42.) *Haseltine* further indicates that the invention is implemented as a relational database. For example, *Haseltine* specifically mentions that the data can be loaded into “a database (such as an Oracle Corp. database, for example), via mechanisms such as Oracle’s SQL*Loader utility or other Relational Database Management System (RDBMS) utilities.” (*Haseltine* at column 5, lines 29-36.) *Haseltine* further mentions that “the partitioning process may be carried out according to the parameters set out, for example, in chapter 8 of *Oracle8 Server Concepts*, release 8.0© 1997 Oracle Corporation.” (*Haseltine* at column 5, line 67-column 6, line 2.) An Oracle database is a relational database, and *Haseltine* does not disclose embodiments implemented as other type of databases. Thus, *Haseltine* does not disclose the use of objects in a system implemented as a relational database. For at least this additional reason, the cited art does not support the rejection of claim 9. Therefore, Applicants respectfully request that the rejection of claim 9 be withdrawn and the claims allowed.

Claim 10 depends from claim 9. As explained, *Haseltine* does not support the rejection of claim 9. Accordingly *Haseltine* also does not support the rejection of claim 10 for at least the same reasons set forth above in connection with claims 8 and 9. Therefore, Applicants respectfully request that the rejection of claim 10 be withdrawn and the claims allowed.

II. The Rejections under 35 U.S.C. § 103(a)

A. Haseltine in view of Newswire

a. Claims 1-5

In rejecting claim 1, the Examiner asserts that *Haseltine* teaches every recitation of the claim except for “permitting access by the customer to billing information from one of the billers at an unscheduled time.” To make up for this deficiency, the Examiner cites to *Newswire*. Applicants respectfully traverse the rejection because the Examiner did not establish a prima facie case of obviousness.

In this case, *Haseltine* does not disclose or suggest “providing the customer identification information to one of the billers as part of a first request indicating enrollment in the bill presentment and payment system.” Instead, *Haseltine* discloses two ways that the customers may register themselves to the bill presentment and payment database. “Customers wanting to view and pay bills may register themselves by accessing an HTML registration page.” (*Haseltine* at column 8, lines 65-66.) “Alternatively, billers may supply the necessary customers information and enroll or register customers in a batch mode by loading the customer data into an interface provided in the staging area over” http or ftp. (*Haseltine* at column 8, line 67-column 9, line.) “Once enrolled, customers may access the main ‘login’ Web page for the bill present and payment service.” (*Haseltine* at column 9, lines 11-13.) However, nowhere does *Haseltine* disclose or suggest “providing the customer identification information to one of the billers as a part of a first request indicating enrollment in the bill presentment and payment system,” as asserted by the Examiner.

Moreover, *Haseltine* does not disclose or suggest, “providing the customer identification information to one of the billers as part of a first request indicating enrollment in the bill presentment and payment system.” In both enrollment methods disclosed in *Haseltine*, the enrollment data collected or transmitted by the billers in the process is stored within the database. As a result, the customers log onto the system where the database is maintained. For example, in the case wherein the thick consolidator maintains the database, a “customer may log onto an Internet Web site maintained by the thick consolidator.” (*Haseltine* at column 10, lines 15-17.) Because the customers log on the system where the enrollment data is stored, there is no need for the bill presentment and payment system to provide the customer identification information to one of the billers as part of a first request indicating enrollment. Accordingly, *Haseltine* neither explicitly nor implicitly teaches “providing the customer identification information to one the billers as a part of first request indicating enrollment in the bill presentment and payment system,” as recited in claim 1. *Newswire* fails to make up for these deficiencies. Accordingly, the cited art fails to support a prima facie case of obviousness. As a result, the rejection is improper and should be withdrawn.

Claims 2-5 depend from claim 1. As explained, the cited art does not support the rejection of claim 1 under 35 U.S.C. § 103(a). As such, the cited art does not support the rejection of claims 2-5 for at least the same reasons set forth in connection with the response to the rejection of claim 1. Further, *Haseltine* in view of *Newswire* does not disclose or suggest the recitations of these dependent claims. For example, *Haseltine* or *Newswire* does not teach or suggest “transmitting a second request to the one of the billers to access billing information.” As explained, when the bill data is available locally

within the database disclosed by *Haseltine* for either the bill presentment system or the consolidators, there is no need for either the bill presentment system or the consolidators to transmit request to the one of the billers. Further, when the thin consolidator disclosed by *Haseltine* maintains only bill summary data within its database, the thin consolidator may maintain a customer accessible link so that the customers can directly connect to the billers' Web site to obtain detailed bill data. (*Haseltine* at column 10, line 59-column 11, line 5.) In this regard, the rejection is improper because the Examiner incorrectly alleges that the customer accessible link maintained by the thin consolidator taught by *Haseltine* constitutes the second request to the one of the bilers to access billing information. (OA at p.5.) The Examiner's position is misplaced.

A customer accessible link in a form of URL merely provides the location information of the billers' Web site. Thus, customers click the customer accessible link, the customers' browsers send HTTP requests directly to the billers' Web site using the location information from the link without any further participation or processing from the consolidator. Accordingly, maintaining the customer accessible link cannot constitute "transmitting a second request to the one of the billers to access billing information," as asserted by the Examiner. For at least these additional reasons, the cited art does not support the rejection of claims 2-5 under 35 U.S.C. § 103(a). Therefore, Applicants respectfully requests that the rejection of claims 2-5 be withdrawn and the claims allowed.

b. Claims 6-7

In rejecting claim 6, the Examiner asserts that *Haseltine* teaches every recitation of the claim except “forwarding the retrieved information to the requesting IBPP system at an unscheduled time.” (OA at p.6.) The Examiner, however, alleges that “(i)t would have been obvious to anyone skilled in the ordinary art at the time of invention to include the teachings of *Newswire* to the disclosure of *Haseltine* so that a customer can access their account information anytime they choose.” (*Id.*) Applicants respectfully disagree.

For example, *Haseltine* does not teach “receiving, from a requesting IBPP system, a request for information associated with a customer,” as asserted by the Examiner. Indeed, the Examiner alleges that “the steps of logging on represents an implied request for information” is taught by *Haseltine* at column 10, lines 44-52. (OA at p.5.) *Haseltine* actually discloses that it is the customers who log onto the system. Therefore, even if the logging onto the system represents an implied request, the request is not from a IBPP system. Accordingly, *Haseltine* does not teach “receiving, from a IBPP system, a request for information associated with a customer,” as recited in claim 6.

Further, *Newswire* does not teach “forwarding the retrieved information to the requesting IBPP system at an unscheduled time,” as asserted by the Examiner. For instance, *Newswire* mentions, as one of the benefits of IPlanet BillerXpert Consolidator Edition, that the billers “can reach customers more than just once a month.” (*Newswire*, ¶15.) However, the fact that the billers can reach customers more than just once a month does not mean that the bill presentment and payment system forwards the

retrieved information to the requesting IBPP system at an unscheduled time. Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claim 6 and allow the claim.

Claim 7 depends from claim 6. As explained, the cited arts do not support the rejection of claim 6. As such, the cited art does not support the rejection of claim 7 for at least the same reasons set forth in connection with the response to the rejection of claim 6. Therefore, Applicants respectfully request that the rejection of claim 7 be withdrawn and the claim allowed.

c. Claims 14-20

The Examiner rejects claims 14-20 for the same reasons set forth in connection with claim 1-7. (OA at p.6.) As explained, the cited art does not support the rejection of claims 1-7. As such, the cited art does not support the rejection of claims 14-20 for at least the same reasons set forth in connection with the response to the rejection of claims 1-7. Therefore, Applicants respectfully request that the rejection of claims 14-20 be withdrawn and the claims allowed.

B. Haseltine

a. Claims 11-13

Claims 11-12 depend from claim 8. As explained, the cited art does not support the rejection of claim 8. As such, the cited art does not support the rejection of claims 11-12 for at least the same reasons set forth in connection with the response to the rejection of claim 8. Further, in rejecting claim 11, the Examiner incorrectly asserts that *Haseltine* discloses “an example wherein the consolidator module request information from the biller, the biller handles this request and further implements the request

(column 11, line 5-14).” (OA p.7.) The Examiner again incorrectly asserts that “the consolidator is requesting account information for a particular customer that is maintained at the biller site.” (*Id.*) Applicants respectfully disagree with the Examiner’s interpretation of the cited art.

Careful reading of *Haseltine* reveals that the consolidators do not make requests to the billers in response to customers requests. The specific section of *Haseltine* that the Examiner relies on to support the assertion reveals that the thin consolidator maintains a customer accessible link to the billers. However, as explained earlier, when the customers use the customer accessible link in form of URL, it is the customers that make direct requests to the billers. Therefore, the Examiner is incorrect in asserting that *Haseltine* discloses an example wherein the consolidator module request information from the biller and that the consolidator is requesting account information for a particular customer that is maintained at the biller site.

Further, in rejecting claims 11-12, the Examiner correctly admits that *Haseltine* does not explicitly disclose “a server object, which receives a request from the consolidator module,” “a request handler, connected to the server object,” and “an implementation object which receives the request from the request handler.” However, the Examiner incorrectly asserts that these system components would have been obvious in order to “execute the disclosed example, yielding a tangible result.” (OA at p.7.) As explained, *Haseltine* discloses a relational database, which does not implement objects. Accordingly, nothing in *Haseltine* “suggests the desirability” of use of objects in the implementation to yield a tangible result, as asserted. Thus, there is no reason why one skilled in the art would look to use “a server object, which connected to

the server object,” “a request handler, connected to the server object,” and “an implementation object which receives the request from the request handler” as asserted by the Examiner. Therefore, the conclusion in the Office Action was not reached based on facts gleaned from the cited reference. Instead, teachings of the present application were improperly used in hindsight to reconstruct the prior art. For at least these additional reasons, the Examiner has not established a *prima facie* case of obviousness with respect to claim 11-12, and thus, Applicants respectfully request that the rejection of claims 11-12 be withdrawn and the claims allowed.

Claim 13 depends from claim 12. As explained, the cited art does not support the rejection of claim 12. As such, the cited art does not support the rejection of claim 13 for at least the same reasons set forth in connection with the response to the rejection of claim 12. Further, the Examiner incorrectly asserts that “by logging on the customer is, in effect, requesting access to their account information which is then implemented via an HTML or other web based interface.” (OA at p.8.) HTML is a mark up language, and is not an interface. Moreover, the Examiner is misplaced in alleging that information is “implemented via an interface,” is the same as an object that “implements an interface.” Therefore, Applicants respectfully request that the rejection of claim 13 be withdrawn and the claim allowed.

b. Claim 21

Claim 21 includes recitations similar to those of claim 1. As explained in the response to the Examiner’s rejection of claim 1, *Haseltine* does not teach “providing the customer identification information to the biller as part of a first request indicating enrollment in the bill presentment and payment system.” Also, *Haseltine* does not teach

“providing the customer identification information to the biller as part of a request indicating enrollment in the bill presentment and payment system.” Therefore, for at least the same reasons set forth above in connection with those recitations, Applicants respectfully request that the Examiner withdraw the rejection and allow the claim.

c. Claim 22

Claim 22 includes recitations similar to those of claim 6. As explained in the response to the Examiner’s rejection of claim 6, the cited art does not teach “receiving, from a requesting IBPP system, a request for information associated with a customer.” Also, *Haseltine* does not teach “receiving, from the requesting IBPP system, a request.” Therefore, for at least the same reasons set forth above in connection with those recitations, Applicants respectfully request that the Examiner withdraw the rejection and allow the claim.

d. Claims 23-27

Claim 23 includes recitations similar to those of claim 21. As explained in the response to the Examiner’s rejection of claim 21, the cited art does not teach “providing the customer identification information to the biller as part of a request indicating enrollment in the bill presentment and payment system.” Therefore, for at least the same reasons set forth above in connection with those recitations, Applicants respectfully request that the Examiner withdraw the rejection and allow the claim.

Claims 24-27 depend from claim 23. As explained, the cited art does not support the rejection of claim 23. As such, the cited art does not support the rejection of claims 24-27 for at least the same reasons set forth in connection with the response to the rejection of claim 23. Further, *Haseltine* in view of *Newswire* does not disclose or

suggest the recitations of these dependent claims. For example, Claim 24 includes recitations similar to those of claim 2. As explained in the response to the Examiner's rejection of claim 2, *Haseltine* does not disclose "transmitting a second request to the one of the billers to access billing information." Also, *Haseltine* does not disclose "transmitting a request to the one of the billers to access billing information." Therefore, Applicants respectfully request that the rejection of claims 24-27 be withdrawn and the claims allowed.

e. Claims 28-29

Claim 28 includes recitations similar to those of claim 6. As explained in the response to the Examiner's rejection of claim 6, *Haseltine* does not teach "receiving, from a requesting IBPP system, a request for information associated with a customer." Therefore, for at least the same reasons set forth above in connection with those recitations, Applicants respectfully request that the Examiner withdraw the rejection and allow the claim.

Claim 29 depends from claim 28. As explained, the cited art does not support the rejection of claim 28. As such, the cited art does not support the rejection of claim 29 for at least the same reasons set forth in connection with the response to the rejection of claim 28. Therefore, Application respectfully requests that the rejection of claim 29 be withdrawn and the claim allowed.

III. Conclusion

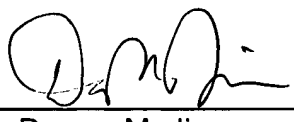
In view of the foregoing remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: July 6, 2006

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